

EXHIBIT 3

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April 28, 2020

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Richard A. Ramler
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Re: Teague v. Remington
Our File: R7923-G7371

Rick:

This is in response to your letter of April 23.

RFP 104 - (if my recollection is correct), I don't think you raised it in your letter of April 14 or that we addressed it during our April 22 conference call.

RFA 1 - we believe this to be a document generated by plaintiff's attorneys in prior litigation and the number count you gave us is off. We will, however, do our own calculation of the total from that document and provide our total to you shortly.

As for the gallery testing records, we have previously produced to you the collection of those materials over a very large time frame. You indicated you have had trouble accessing some of the data provided to you previously in native format. We are looking in to that issue and will get back to you.

With respect to Interrogatory 6 and RFP 107, we agree to provide the net worth of Remington. As we indicated during our April 22 call, we are in the process of working with DuPont on this issue as related to DuPont, but we do not yet have an answer on what can be provided. DuPont's office is closed because of the COVID-19 situation. As we indicated, much of DuPont's past historical financial data is otherwise available in prior public SEC filings. You have also asked for SGPI's net worth, and we are endeavoring to find out what we can get to you on that front. As we discussed, we will

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need a confidentiality stipulation as to any non-public financial information provided. We will work up a draft on that and send it to you for your review and comment.

With respect to Interrogatory 7 and RFAs 9 through 14, we are working with our clients (as best we can under the current environment) to further respond to these requests. With respect to Interrogatory 7, we will provide the names of the officers and directors of DuPont and SGPI. With respect to RFAs 9 and 10, we will supplement and respond to these requests, over objections, by May 8.

RFAs 11 through 14 - it is unclear what additional information you are seeking given that we responded to these over objections. We believe the objections are appropriate given the context and circumstances of the requests.

RFP 97 - it was not raised in your letter of April 14 or addressed during our call on April 22.

As for most of the remaining items raised in your letter of April 14, you indicated during our call that we were "at an impasse" over those items, some of which were not specifically addressed during the April 22 call. As we indicated in our responses to plaintiffs' discovery requests and reiterated during our call, you have previously acknowledged (in multiple other court filings) as being in possession of all critical documents produced in prior litigation. Plaintiffs' initial disclosures in this case (including the voluminous materials listed in the report of plaintiffs' liability expert) confirm that fact.

With regard to the materials collected in the barrel burst litigation over 25 years ago, we previously reached an agreement with prior counsel in this case for review and production of specified bolt-action rifle documents from those materials. Pursuant to that agreement, and at great time and expense to our client, those documents were reviewed and produced to plaintiffs many months ago. The breadth and burden of your requests also fail to properly consider the "proportionality" and "need" requirements of Rule 26.

If you have any questions or wish to discuss any of these items further, feel free to give Dale or me a call.

Thank you for your courtesy and cooperation.

Take care,

Bob Carlson
Bob Carlson

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